



Jackson Lewis P.C.
666 Third Avenue
29th Floor
New York, NY 10017
Tel 212-545-4000
Fax 212-972-3213
jacksonlewis.com

March 21, 2025

VIA ECF

Hon. Arlene R. Lindsay, U.S.M.J.
United State District Court
Eastern District of New York
814 Federal Plaza
Central Islip, New York 11722

**Re: Jesus Romero v. Frame Auto Collision Inc. et al
Case No. 24-CV-1998 (JMA)(ARL)**

Dear Judge Lindsay:

We are counsel for Defendants Frame Auto Collision Inc. and Jesus Pagan in this matter. Together with Plaintiffs' counsel, we write with a status update and to request a 45-day extension of time to complete mediation in this matter.

The parties are still in the process of stipulating to conditional certification, subject to the Court's approval. Plaintiffs' position remains that mediation can proceed after the conclusion of the notice period. Defendants' position is mediation can proceed before the conclusion of the notice period.

Thank you for your attention to this matter.

Respectfully submitted,

JACKSON LEWIS P.C.

/s/ Douglas J. Klein

Douglas J. Klein

CC: all counsel of record (via ECF)

